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April 23, 2021

Honorable Robert D. Drain
United States Bankruptcy Judge
U.S. Bankruptcy Court for the District of New York
2000 Quarropas Street
White Plains, NY 10601-4140

Re: The Official Committee of Unsecured Creditors v. McKesson Corp.
(Adv. Pro. 17-08264);
The Official Committee of Unsecured Creditors v. Pharmacy Systems, LLC
(Adv. Pro. 17-08265); and
The Official Committee of Unsecured Creditors v. McKesson Specialty Care
Distribution Corp. (Adv. Pro. 17-08266)
(collectively, the “Adversary Proceedings”)

Dear Judge Drain:

The Plaintiff and the McKesson defendants have made substantial progress in completing discovery in each of the Adversary Proceedings. Nevertheless, they respectfully submit this joint request for one final extension of the discovery cutoff deadline and reschedule the pretrial conferences in each of the Adversary Proceedings. All parties in the Adversary Proceedings request an extension of the discovery cutoff from May 14, 2021 to Friday, July 16, 2021, and rescheduling the final pre-trial conference to Tuesday, August 3, 2021, if the Court is available on that date. We have been diligently moving the cases forward but we believe that additional time will be necessary to complete discovery.

The main reason why the parties request the extension is to permit the parties to take approximately ten (10) depositions of witnesses located in multiple states throughout the United States, some of whom are completing their vaccine processes and have personal or family medical issues. There are also outstanding discovery requests, and potential expert witness issues, that remain to be resolved. The parties believe these issues can be resolved within the time allowed.

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Based on the foregoing, the parties respectfully request that the enclosed proposed amended scheduling and pre-trial orders be entered by the Court.

Very truly yours,

BUCHALTER

A Professional Corporation



Jeffrey K. Garfinkle
Shareholder

cc: Tracy Klestadt, Esq.
Richard K. Milin, Esq.

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